

KENT J. SCHMIDT (SBN 195969)
SARAH SHAHOLLI (SBN 254943)
BRYAN M. MCGARRY (SBN 258156)
DORSEY & WHITNEY LLP
600 Anton Boulevard, Ste. 2000
Costa Mesa, CA 92626-7655
Telephone: (714) 800-1400
Facsimile: (714) 800-1499
schmidt.kent@dorsey.com
shaholli.sarah@dorsey.com
mcgarry.bryan@dorsey.com

Attorneys for Specially Appearing
Defendants HAITING LI,
ZHIYAN LI and Nominal Defendant
PACIFIC BEPURE INDUSTRY, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GREAT DYNASTY INTERNATIONAL
FINANCIAL HOLDINGS LIMITED,

Plaintiffs,

vs.

HAITING LI AND ZHIYAN LI,
Defendants,

and

PACIFIC BEPURE INDUSTRY, INC.,
Nominal Defendant.

CASE No. 3:13-cv-01734-EMC

*Assigned for all purposes to the Honorable
Edward M. Chen*

**JOINT STIPULATION REGARDING
SPECIALLY APPEARING
DEFENDANTS' WAIVER OF THE
SERVICE OF SUMMONS AND
CORRESPONDING EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

Plaintiff Great Dynasty International Financial Holdings Limited (“Plaintiff”), Specially Appearing Individual Defendants Haiting Li and Zhiyan Li, and Specially Appearing Nominal Defendant Pacific Bepure Industry Inc. (all Defendants referred to as the “Specially Appearing Defendants”) (Plaintiff and Specially Appearing Defendants collectively referred to as the “Parties”), through their respective counsel, stipulate, agree, and jointly move the Court as follows:

WHEREAS, Plaintiff filed its Complaint on April 14, 2013 (Dkt. No. 1);

WHEREAS, Plaintiff has been attempting to serve the Summons and Complaint in compliance with the Hague Convention pursuant to Fed. R. Civ. P. 4(f)(1), as set forth in its Motion to Continue Case Management Conference to October 3, 2013 and Related Deadlines Accordingly (Dkt. 15);

WHEREAS, Plaintiff has indicated that the time for service of judicial documents in China in accordance with the Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (“Hague Service Convention”) is estimated to take between four to seven months (Dkt. No. 17);

WHEREAS, Plaintiff served nominal Defendant Pacific Bepure Industry, Inc. on August 12, 2013 (Dkt. No. 19);

WHEREAS, Plaintiff is still awaiting confirmation from the Central Authority in China that service on Individual Defendants Haiting Li and Zhiyan Li is complete (as set forth in its Notice re: Status of Service on Defendants filed on August 26, 2013 (Dkt. No. 20)) and it is presently unclear when service will be deemed complete;

WHEREAS, to expedite the matter and avoid the expense and time of effectuating formal service, the Specially Appearing Defendants have agreed to be represented by the undersigned counsel of record, enter into a special appearance for purposes of this Stipulation, and waive formal service of process pursuant to Fed. R. Civ. P. Rule 4;

WHEREAS, Specially Appearing Defendants’ special appearance and agreement to waive formal service of process is made with a reservation of all rights to contest venue and/or make other jurisdictional arguments along with a reservation of all other rights;

1 WHEREAS, the Parties have met and conferred and agree, that in light of the Specially
2 Appearing Defendants' agreement to waive formal service and accept service, and given the challenges
3 with obtaining facts and information relevant to the background of this matter including the location of
4 the parties and document translation needs; and

5 WHEREAS, Fed. R. Civ. P. Rule 4(d)(1)(F) contemplates a 60-day period for a waiver of
6 service by a defendant outside any judicial district of the United States;

7 IT IS HEREBY STIPULATED by the Parties through their undersigned counsel of record that
8 the Specially Appearing Defendants will waive service and will answer or otherwise respond to
9 Plaintiff's Complaint on or before November 1, 2013.

10 DATED: September 9, 2013

LOCKE LORD LLP

11 By: /s/ Sally W. Mimms

12 Sally W. Mimms

13 Attorney for Plaintiff

14 Great Dynasty International Financial Holdings
Limited

15 DATED: September 9, 2013

DORSEY & WHITNEY LLP

17 By: /s/ Kent J. Schmidt

18 Kent J. Schmidt

19 Sarah K. Shaholli

20 Attorneys for Specially Appearing Defendants

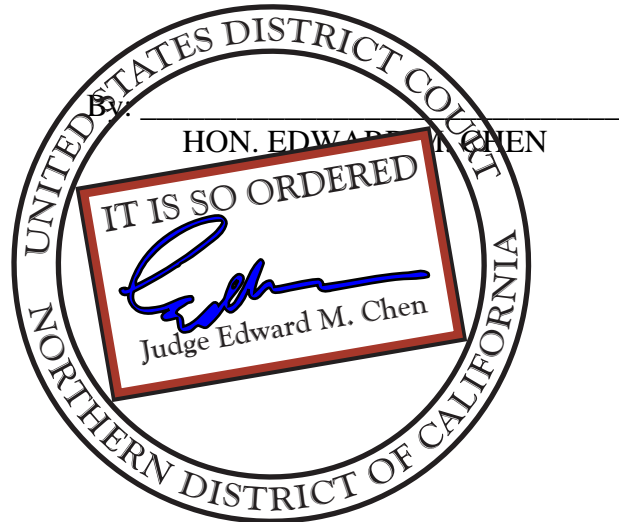
21 Haiting Li, Zhiyan Li and Nominal Defendant

22 Pacific Bepure Industry, Inc.
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 9/9/13 _____



CERTIFICATE OF SERVICE

I, Maria Santos, hereby certify and declare as follows:

I am over the age of 18 years and not a party to the within action. My business address is 600 Anton Blvd., Ste. 2000, Costa Mesa, CA 92626. On September 9, 2013, I caused service of the following document(s) on counsel for all parties to this action by electronically filing the document(s) with the Clerk of the District Court using its ECF System, which electronically notifies them. The document(s) served include:

**JOINT STIPULATION REGARDING SPECIALLY APPEARING DEFENDANTS'
WAIVER OF THE SERVICE OF SUMMONS AND CORRESPONDING EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 9th day of September, 2013, at Costa Mesa, California.

/s/Maria Santos
Maria Santos